

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Petition of Funds For Learning, LLC)	CC Docket No. 02-6
)	
Schools and Libraries Universal Service)	
Support Mechanism)	
)	

**COMMENTS OF THE
COUNCIL OF THE GREAT CITY SCHOOLS**

The Council of the Great City Schools, a coalition of 65 of the nation's largest urban school districts, asks the Commission to delay the Administrator's setting of the funding year 2010 threshold. We are not asking that USAC's recommendation of an 81% threshold be rejected at this time, as Funds for Learning requested in their petition. We believe it is reasonable for the Commission and the Administrator to wait a short period of time in order to better estimate the amount of funding that is necessary to fund the highest poverty applicants in funding year 2011, and determine if there is additional funding available to possibly satisfy the 80% applications in funding year 2010.

Schools in Council districts enroll the highest number of disadvantaged children, employ the largest number of teachers, and operate in the greatest number of outdated and deteriorating buildings. Specifically, the Council of the Great City Schools represents approximately 26 percent of the nation's Hispanic students, 32 percent of the nation's African American students, and 25 percent of the nation's children living in poverty. We agree with Funds for Learning that there are applications from schools and libraries that are also economically disadvantaged, albeit not to the same extreme degree as those in the 90 percent band. These kinds of schools and districts exist within the Council and stand to benefit from the funding of FY 2010 applications at the 80% level.

As we have stated in past comments, statements, testimony, and communications with the Commission, however, we remain committed to the highest poverty schools in the nation and believe the E-Rate should continue to prioritize funding for these sites. We feel it is important for USAC to ensure that sufficient funds are available to fund Priority 2 requests for the highest poverty 90% schools in funding year 2011 – a scenario that would be in jeopardy if program funds are depleted to satisfy lower-poverty applications in funding year 2010. We believe that sufficient funding available from previous year's unused funds should be set aside for funding year 2011.

While the Commission and the Administrator should ensure that these previously unused funds are available for the nation's highest poverty applicants next year, they can afford to delay the decision on the 81% threshold for this year until more information, and potentially more funding, becomes available. The Administrator's recommendation for the funding year 2010 threshold was provided much earlier than in previous years, by multiple months. The 2011 application window closes in the coming weeks, and the Administrator typically provides the Commission with an estimate of the upcoming funding demand after one month of reviewing and analyzing the submissions. Additionally, delaying the threshold decision allows more funding year 2010 applicants to submit Form 500s and release funds that have already been committed. Delaying the Commission's decision for a short period will allow these two actions to unfold, and will give us a better picture of how much funding is needed to ensure support for the 90% applicants in 2011, and whether or not there is enough remaining to fund the 80% band in 2010.

Conclusion

The value of the E-Rate is immeasurable to urban students and the inner-city. Prior to the E-Rate, shallow resources and a historically deep digital divide often left school districts with no chance to provide the technology that has enhanced teaching and learning elsewhere. The Commission should delay a decision on the 2010 funding threshold to determine if sufficient funding is available to reach the 80% band, but must do so in recognition of the need to prioritize support to the nation's highest poverty schools. Results on the National Assessment of Education Progress (NAEP) during the past decade has shown that the targeting of limited federal resources – through policies found in No Child Left Behind, School Improvement Grants, the National School Lunch Program (NSLP), and the E-Rate – has helped urban school districts, although still lagging behind, make significant and greater gains than any other entity in the United States. These are test results the entire nation should be encouraged about.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Michael D. Casserly". The signature is fluid and cursive, with the first name "Michael" being more prominent than the last name "Casserly".

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